

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
19-20141-CR-KING

UNITED STATES OF AMERICA,

vs.

VICTOR ROJAS,

Defendant.

/

STIPULATED FACTUAL PROFFER

If this matter were to proceed to trial, the Government would prove the stated facts beyond a reasonable doubt. The Parties agree that these facts, which do not include all facts known to the Government and the Defendant, are sufficient to prove the Defendant's guilt for conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1956(h).

Specifically, Victor Rojas and others, conspired to knowingly conduct financial transactions affecting foreign commerce, knowing the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that such transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Codes, Section 1956(a)(1)(B)(i); and the specified unlawful activity is the felonious receiving, concealing, buying, selling and other dealing in a controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), punishable under the laws of the United States.

On or about December 2014, a confidential source (CS) initially discussed "money pick-up" money laundering contracts with Ruben Dario Rojas Bascope ("Ruben Rojas"), a Bolivian national, residing in Bolivia. At the time, Ruben Rojas had two brothers, Juan Rojas and Victor Rojas, who both resided in the United States of America. Juan Rojas lived in South Florida, and Victor Rojas lived in New York City, New York.

Ruben Rojas asked the CS to enter into “money laundering contracts” in exchange for receiving a commission. The contracts involved the CS’s associates being introduced to other money couriers and then picking up money from them and then depositing and wiring that money to other bank accounts as directed by Ruben Rojas. The CS’s associates would retain a “commission” for laundering the money of approximately 5-7% of the amount of bulk currency that was picked up.

The CS introduced undercover law enforcement officers to conduct these money pick-ups. Between March 2015 and May 2016, the UCs picked up bulk currency on nine (9) occasions. Three pick-ups were in South Florida, and six pick-ups were in Amsterdam, Netherlands. For the three money pick-ups in South Florida (money pick up #2, #3, and #8), Juan Rojas personally delivered the money to the same UC as indicated below:

Date	Amount of Bulk Currency Picked up by UC	Location	Courier	Wired to Bank Accounts Including these Individuals
3/31/2015 Money pick-up #1	500,000 Euros	Amsterdam, Netherlands	Unknown	2 wires to JUAN’s Florida bank account totaling \$100,000; 3 wires to VICTOR’s Chase 9865 NY bank account totaling \$150,000
5/12/2015 Money pick-up #2	\$179,985 USD (\$4,985 retained as commission)	11401 NW 12th Street (Dolphin Mall parking lot), Miami, Florida	JUAN ROJAS	1 wire to VICTOR ROJAS’ NY bank account of \$35,000
5/29/2015 Money pick-up #3	\$200,080 USD (\$10,040 retained as commission)	Fuddrucker’s 525 SW 145 Terrace, Pembroke Pines, FL	JUAN ROJAS	VICTOR ROJAS received a total of \$110,000 into two NY accounts;

				JUAN ROJAS received \$1,000 into one Florida account
7/17/15 Money pick-up #4	257,145 Euros	Amsterdam, Netherlands	Unknown	Two wires totaling \$170,000 into VICTOR's Chase (9865) account; JUAN received \$100,000 into his Florida account
7/21/15 Money pick-up #5	311,000 Euros	Amsterdam, Netherlands	Unknown	2 wire transfers totaling \$200,000 to VICTOR's two NY bank accounts; \$87,535 to JUAN's Florida bank account
8/8/15 Money pick-up #6	194,000 Euros	Amsterdam, Netherlands	Unknown	VICTOR received \$198,016 in one NY bank account
8/26/15 Money pick-up #7	409,370 Euros	Amsterdam, Netherlands	Unknown	VICTOR received a total of \$250,000 into two NY bank accounts JUAN received \$166,615 into a Florida bank account
1/25/2016 Money pick-up #8	\$501,006 USD (\$25,051 retained as commission)	Fuddrucker's 525 SW 145 Terrace, Pembroke Pines, FL	JUAN ROJAS	4 wires of \$100,000 each (\$400,000) to VICTOR into two NY bank accounts
5/25/16 Money pick-up #9	225,020 Euros	Amsterdam, Netherlands	Unknown	2 wire transfers totaling \$220,000 to VICTOR's two NY bank accounts
	\$2,750,671 USD			

Each time Juan Rojas delivered the money in South Florida (\$179,985 USD on 5/12/15, \$200,080 on 5/29/15, and \$501,006 on 1/25/16), he turned it over to the UC in a parking lot. On the first two pick-ups, the money was delivered in a black backpack with a "Real Madrid" logo. A narcotics dog gave a positive alert on each of the three bulk cash pick-ups in South Florida.

Another confidential source (CS2) positively identified Juan Rojas from his driver's license photo as a person that CS2 delivered bulk-cash drug proceeds to on at least two occasions in 2015. CS2 picked up drug proceeds in South Florida from an unknown individual at the direction of a Bolivian drug trafficker and each time the money was contained in black back packs with "a soccer logo" (consistent with Real Madrid). After receiving the drug proceeds, CS2 then delivered the proceeds to Juan Rojas in the same black back packs. CS2 was directed to tell Juan Rojas that this money was on behalf of "Ruben Dario." Phone records indicate that the CS's phone was in contact with Juan Rojas' phone (ending 8412) approximately 14 times on May 29, 2015, the day that Juan Rojas delivered \$200,080 in a black back pack with a "Real Madrid" logo to an undercover agent.

Bank records indicate that Victor Rojas received some of the proceeds of all of the 9 money pick-ups from a UC bank account into his personal bank accounts in New York and wired them to other domestic and foreign accounts. Ruben Rojas advised the CS about each money pick-up and he advised the CS to direct that a certain portion of each pick-up be wired to Victor Rojas' New York bank accounts. Victor Rojas accepted, controlled and then wired approximately \$ 1,733,016 in drug trafficking proceeds through his personal New York bank accounts.

For example, in relation to money pick-up #1, after the UC received the 500,000 Euros in Amsterdam, Netherlands, on March 31, 2015, the CS was directed by Ruben Rojas to wire certain amounts to a New York bank account controlled by Victor Rojas. On April 9, 2015, the UC bank account transferred \$48,534 USD to Victor Rojas' Chase bank account ending in 9865. On April 10, 2015, the UC bank account transferred \$55,280 USD to Victor Rojas' Chase bank account ending in 9865. This amount totaled \$103,814. On April 13, 2015, Victor Rojas wired \$40,000 and \$60,000 (a total of \$100,000) to a corporate bank account, Jorvi Representaciones,

at a South American bank. The bank did not accept these wires and returned them on April 17, 2015. On April 20, 2015, Victor Rojas wired \$95,000 to another South American bank.

For example, in relation to money pick-up #8, after the UC received \$501,006 USD in Pembroke Pines, Florida on January 25, 2016, the CS was directed by Ruben Rojas to wire certain amounts to two New York Bank accounts controlled by Victor Rojas. On January 29, 2016, the UC bank account transferred \$100,000 USD to Victor Rojas' Chase bank account ending in 9865. On that same day, January 29, 2016, the UC bank account transferred \$100,000 USD to Victor Rojas' Bank of America bank account account ending 0937.

Victor Rojas was arrested in April 2019 in Miami, Florida. Post-*Miranda*, Victor Rojas admitted that he would wire money for his brother Ruben Rojas through bank accounts and was paid approximately \$1,000 for every \$100,000 that he wired. He admitted that he received wire transfers from third parties including a "R.M." in Florida and wire transferred those funds to Ruben Rojas in Bolivia. He admitted that the funds he moved for Ruben Rojas were from drug trafficking organizations.

ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY

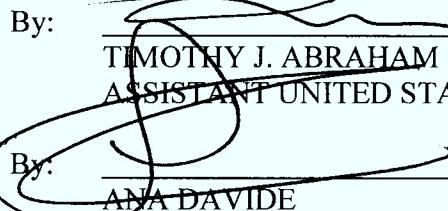
Date: 1/27/20

By: _____


TIMOTHY J. ABRAHAM
ASSISTANT UNITED STATES ATTORNEY

Date: 1-27-20

By: _____


ANA DAVIDE
ATTORNEY FOR THE DEFENDANT

Date: 1-27-20

By: _____


VICTOR ROJAS
DEFENDANT